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11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 RAND L. HAGERMAN,

15 Plaintiff,

16 vs.

17 EQUIFAX INFORMATION SERVICES LLC,
18 and BANK OF AMERICA N.A.,

19 Defendants.

Case No.: 2:20-cv-02089-JAD-VCF

20 **JOINT MOTION TO EXTEND**
21 **DEADLINE TO RESPOND TO**
22 **PLAINTIFF'S COMPLAINT**

23 **(FIRST REQUEST)**

24 Plaintiff, Rand L. Hagerman ("Plaintiff"), and Defendant, Bank of America, N.A. ("Defendant") (collectively the "Parties"), by and through their counsel of record, hereby stipulate and agree as follows:

25 On November 30, 2020, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with Plaintiff's Complaint on November 18, 2020. As such, Defendant's deadline to respond to the Complaint is December 9, 2020. Defendant is currently investigating the allegations of the Complaint and needs additional time within which to conduct the investigation and respond to the Complaint. The time within which to respond has not expired. Defendant and Plaintiff are also exchanging information informally to aid with that process.

26 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file its responsive pleading to Plaintiff's Complaint to January 8, 2021.

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1 This is the first stipulation for extension of time for Defendant to file its
2 responsive pleading. The extension is requested in good faith and is not for purposes of delay or
3 prejudice to any other party.

4 DATED this 9th day of December, 2020.

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6 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

7 /s/ Darren T. Brenner

/s/ George Haines

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15 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 12-10-2020
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